

# **EXHIBIT 3**

Message

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**From:** Joshua Rizack [jrizack@therisinggroup.com]  
**Sent:** 3/7/2019 4:25:29 PM  
**To:** Steven Donziger [sdonziger@donzigerandassociates.com]  
**Subject:** Re: List of documents for Chevron  
**Attachments:** 2515\_001.pdf

See attached list

#63728132v10\_US\_ - JVM Investor Judgment Agreement[2]

#DRAFT Contract AMP-FRENTE #ESP.docx

#DRAFT Contract AMP-FRENTE.docx

% of deal

~\$Donziger ATTY Acct 2007 -2011.xlsx

~\$INVESTMENT OPPORTUNITY.pptx

~\$Org Chart.pptx

~\$SD Exp Sheet Jan 2012.xlsx

~\$ver email II.docx

~WRL0003.tmp

1117\_001.pdf

1118\_001.pdf

1119\_001.pdf

1119\_049.pdf

1120\_001.pdf

1121\_001.pdf

2011.10.18 Executed Contingent Fee Agreement.PDF

2011.12.03 Letter & Proposal to Julian Jarvis.pdf

2011.12.23 Letter to J. Jarvis re Fee Proposal.pdf

2450\_001.pdf

2451\_001.pdf

2452\_001.pdf

2453\_001.pdf

4529\_001.pdf

32105llap

20120815 [SRD amended answer and counterclaims].pdf

20160824 Rizack Investor #DRAFT #ESP.DOCX

20160824 Rizack Investor #DRAFT.DOCX

Account Payable

Active AP.pdf

ACUERDO DE CONTRATACIÓN DE SUSTITUCIÓN.pdf

Acuerdo de inversión \_ inglés.pdf

ACUERDO DE INVERSION 200 ESP.pdf

Acuerdo de Inversion En La Sentencia de Ecuador.pdf

ADP .PDF

Advisory Agreement -- Ben Barnes (2011-11-01) (English).docx

Advisory Agreement -- Hinton (2011-10-19) (English).docx

Advisory Agreement -- JJ (2012-01-09) (English).docx

Advisory Agreement -- Lehane-Fabiani (2011-02-17) (English).docx

Advisory Agreement -- Nextant (execution) (English).docx

Advisory Agreement -- Rizack (2011-10-19) (English).docx

Advisory Agreement -- Tom Downey (2011-09-27) (English).docx

Advisory Agreement -- Tom Downey (executed)(English).pdf

Advisory Agreement -- TRG (execution) (English).docx

Advisory Agreement -- TRG (execution) (Spanish)

Advisory Agreement -- Willie Brown (2011-10-19) (English).docx

Agenda (2012-01-04).docx

Agreement between Kohn and Donziger re allocation and distribution of fees  
(2008.08.07).pdf

Agreement to Dispute a Case Against Chevron (2006.04.27).pdf

Agreements needed

AKTI Agreement.pdf

Amazon\_AdPlan.xlsx

Amazon\_EarnedMediaPlan033012.docx

Amazon\_EarnedMediaPlan033012[1].docx

Amazon\_MessagingPlan033012.docx

Amazon\_MessagingPlan033012[1].docx

Amazon\_OnlinePlan033012.docx

Amazon\_TacticalPlan033012.xlsx

Amazon\_YoudCareDeck033012.pdf

Amazonia Budget\_01.20.12.xlsx

Amazonia Budget\_02.16.12.xlsx

Amazonia Budget\_4.12.12.xlsx

Amazonia Term Sheet 1.18.16.docx

Amazonia Term Sheet 3.10.16.docx

Amazonia Term Sheet 6.27.16.docx

Amazonia Term Sheet 6.27.docx

Amazonia Term Sheet\_011516

Amazonia Term Sheet\_071012[1]

Amazonia Term Sheet\_071612

AP 3.10.12.xlsx

Appendice 2.pdf

Appendice 3.pdf

APPENDIX 1.pdf

Appendix2

attachment.pdf

AX dowloan 10.19.13 ro 9.21.14.csv

AX dowloan 10.19.13 ro 10.31.15.csv

AX Download 5.14.14 - 8.29.15.xls

AX jan - Mar

Billing and Exp to date

Billings2003-2007

Briefing Book Template 032612

Budget 6.11.12.xlsb

Budget 7.5.12.xlsb

Budget 7.12 (combo)

Budget 7.12 (Full Payments)

Budget 7.12 (No RICO)

Budget 7.16.16.xlsb

Budget 8.17 (Full Payments)

Budget 9.11 (fixed fees 25%)

Budget 9.11 (fixed fees)

Budget 10.5.12.xlsb

Budget 10.6 (fixed fees)

Budget 10.14 (6)

Budget 10.15 (6)

Budget 10.24 (6)

Budget 11.4.12 (6)

Canada launch blog post.docx

canada launch press release draft.docx

cap chart

Cap Chart 2.22.16.xlsx

Cap Chart Carmody

Cap Chart May 2016

Carmody Letter from JRice 111011.pdf

Carta Motley Rice (EN) (2011.10.19).pdf

Case Budget.xlsx

Case Overview for Claimants\_033012[1]

Cases in which ECBA remains counsel of record for the LAPs  
(2012.01.04)(unconfirmed).docx

Certificación 200.00.pdf

Certificación 300.000.pdf

Certificate of incorporation - Indigenous People Limited.pdf

Chevron CA2 Opinion - 2nd circuit appeal.pdf

Chevron Ecuador Deck\_April 4\_R2[2].pdf

Chevron Project 12-27.mov

Chevron-Ecuador\_Risk\_Analysis\_Report\_May2011

Chevron-Ecuador\_Risk\_Analysis\_Report\_May2011.pdf

Clean Up Ecuador Campaign Expansion Proposal.pdf

Confidential Memorandum (as of 2012.07.09)[1]

Confidential Memorandum (as of 2012.07.10)

Confidential Memorandum\_031312.pdf

confidential proposal for New Orleans lawyers.msg

Confidential Settlement Agreement Hudson.pdf

Contact List 1.3.12.docx

Contact List 4.17.12.xlsb

Contact List 4.17.12.xlsx

Contract BILLINESS-FRENTE (English).docx

Contract BILLINESS-FRENTE (Spanish).docx

Contract CONTACTO-FRENTE (English).docx

Contract CONTACTO-FRENTE (Spanish).docx

Contract Donziger-FRENTE (English).docx

Contract Donziger-FRENTE (Spanish).docx

Contract FREIDMAN-FRENTE (Spanish).docx

Contract FRIEDMAN-FRENTE (English).docx

Contract GUPTA-FRENTE (English).docx  
Contract GUPTA-FRENTE (Spanish).docx  
Contract HINTON-FRENTE (English).docx  
Contract HINTON-FRENTE (Spanish).docx  
Contract KREVLIN-FRENTE (English).docx  
Contract KREVLIN-FRENTE (Spanish).docx  
Contract Littlepage-FRENTE (English).docx  
Contract LITTLEPAGE-FRENTE (Spanish).docx  
Contract PHILLIPS-FRENTE (English).docx  
Contract PHILLIPS-FRENTE (Spanish).docx  
Contract Salazar-FRENTE (English).docx  
Contract SALAZAR-FRENTE (Spanish).docx  
Contract SAMPLE-FRENTE (English).docx  
Contract SAMPLE-FRENTE (Spanish).docx  
Contract SHERMAN-FRENTE (English).docx  
Contract SHERMAN-FRENTE (Spanish).docx  
Contract SNOWDY-FRENTE (English).docx  
Contract Snowdy-FRENTE (Spanish).docx  
Contract TRGC-FRENTE  
Contractos.Recomendations.docx  
Contractos.Recomendations[3].docx  
Contrato - Inglés copy.pdf  
Contrato - Inglés.pdf  
Copy of LATAM Budget numbers.xls  
Copy of Torvia Payments Reconciliation with NEXTANT adjustment and LATAM Added  
Copy of Torvia Payments Reconciliation\_021612.xlsx



Cover email II.docx

Cover email.docx

critical (1).msg

ct-canada2.png

Daniel English.pdf

Daniel Spanish.pdf

Deal Summary

Distribution Appendix #FINAL.docx

Distribution Escrow Agreement #FINAL.docx

Documento para analizar.pdf

Dole compared to Chevron 4.9.12 Meeting Memo - AMW.pdf

Donziger - signed pages\_7139471.pdf

Donziger ATTY Acct 2007 -2011 (Totaled)

Donziger ATTY Acct 2007 -2011 (version 1).xlsx

Donziger ATTY Acct 2007 -2011 Debt Calculation

Donziger ATTY Acct 2007 -2011.xlsx

Donziger ATTY Acct 2010 -2011.xlsx

Donziger ATTY Acct.xlsx

Draft (2011.12.20) (clean).docx

Draft Confidential Memorandum (DRAFT 2012-03-01)(clean).docx

Draft contract for Gerald to review.msg

Draft PPM (J Rizack sections).docx

ECBA - CARTA ABADY INGLES.pdf

ECBA retainer agreement (2010.10.26) (clean) (execution) (English) (signed by ECBA and plaintiffs).pdf

ECBA retainer agreement (2010.10.26) (clean) (execution) (English).doc

Ecuador - Funding Agreement (Kramer) (execution)(English).docx

Ecuador - Funding Agreement (Torvia) (2011-06-08)(English) (execution)  
(executed by claimants).pdf

Ecuador - Funding Agreement(torys 2010-10-31)(2)(FINAL).DOC

Ecuador Judgment Investment Agreement 200.pdf

Ecuador-NLC Proposal doc2-11-12(PMW comments 2012-03-13).doc

Eisler.Agreement.SpanishFinal.pdf

Engagement Agreement (Lago Agrio matter) (first).msg

Engagement Agreement (Lago Agrio matter) (second) (1).msg

Environmental Justice for Ecuador Committee Timeline.docx

Escrow Agreement \$10 Million

Escrow Agreement Distribution

Escrow Agreement for funds in

Escrow Agreement for signature.docx

EvidenceSummary FINAL.pdf

Executed Intercreditor Agreement.pdf

Exhibit B - Website Bio (Getto).pdf

Exhibt A - Press Release.pdf

Exp Sheet

Exp Sheet April 2012

Exp Sheet December 2012

Exp Sheet Mar 2012

Exp Sheet.xlsx

Expenses Quito Sept 2016

Final Steven Acct 2007-2012

Final Steven Acct 2007-2016 (2.2.17)

Final Steven Acct 2007-2016 (9.18.16)

Fisher.onepagerindigenous.doc

Funder 200 - Appendix 2.pdf

Funder3 Agreement #FINAL[4]\$200k

Funder3 DraftAgreement 6.track[1]

Funder3.Appendix2.docx

Funder200.Final.Aug24

Funder200k.Contract.Aug20[1]

FunderDY.Agreement.Final1

FunderVI Appendix 2 Oct 24 2016

FunderVI Appendix3 Oct 2016

FunderVI Escrow Agreement Oct 24 2106

FunderVI Final Oct 24 2016

FunderVI Final Oct 24 2016 ESP

Funding Agreement (Burford) (executed).pdf

Funding Escrow Agreement #FINAL.docx

Fundraiser NDA (Form)(2012-02-20).docx

FW Chevron v Donziger Chevron v Salazar Ltr and drft pldgs.msg

Gerard\_Maples\_Appearances\_Spreadsheet.XLS

global launch blog post.docx

global launch press release draft.docx

GrossLaw\_Trust\_AC\_Wire\_Instructions.pdf

guidance.msg

H5 - Advisory Agreement - english (Executed)(2011-02-24).pdf

H5 Advisory Agreement 02-10-2011 (CLEAN).docx

H5 Indemnification Letter 08-08-11.pdf

Indemnification Notice 03 Aug 2011.pdf

Intercreditor Agreement(final).DOC

Investment Agreement Glen K.pdf

INVESTMENT OPPORTUNITY.docx

INVESTMENT OPPORTUNITY.pdf

INVESTMENT OPPORTUNITY.pptx

INVESTMENT.Summary.Short.Dec2016.pdf

INVESTOR.Summary.December2016.pdf

Invoice April 2012

Invoice August 2012

Invoice Dec 2011.xlsx

Invoice Feb 2012

Invoice Gibson, Dunn & Crutcher - Chevron v. Steven Donziger

Invoice Gibson, Dunn & Crutcher - Chevron v. Steven Donziger

Invoice Jan 2012.xlsx

Invoice July 2012

Invoice June 2012

Invoice Mar 2012.xlsx

Invoice May 2012

Invoice November 2012

Invoice October 2012

Invoice September 2012

Invoice Septemebr 2012

Israel % Worksheet

Jan 2012 AP Bal

JJ Revised Budget

JJ Revised Budget II 5.17.12.xlsb

JJ Steering

Joint Appendix 3.pdf

JR on SD Exp Sheet August 2012

JRD Engagement Agreement (executed).pdf  
Kohn Termination Letter (2010.07.26).pdf  
Krevlin notes.pdf  
l-WJC to Joe Rice (2011.12.27)(draft).docx  
Lago Agrio (1).msg  
Lago Agrio (2).msg  
Lago Agrio (A-1).msg  
LatAm form Retainer Agreement (2012.01.10).doc  
Latin America Contact List(1)  
Letter Agreement -- Willie Brown (2009-02-26).pdf  
Letter dated 9.23.11 to Treca re proposed trust documents (executed).pdf  
Letter dated 9.28.11 from Treca re Trust Deed delivery.pdf  
Letter dated 9.29.11 from Burford Group alleging breach of Funding Agreement.pdf  
Letter dated 9.29.11 from Treca purporting to terminate Funding Agreement.pdf  
Letter dated 9.29.11 from Treca re settlement offer.pdf  
Letter dated 10.14.11 from Treca re intercreditor agreement.pdf  
Letter dated October 6, 2011 to Burford from SRD and others.pdf  
Letter dated October 6, 2011 to Treca re acceptance of termination of FA.pdf  
Letter from Bill Narwold to WJC (2011.10.31).pdf  
Letter from Joe Rice to WJC (2011.11.10).pdf  
Letter from Jonathan Abady (2011.02.05) (Spanish).DOC  
Letter from Jonathan Abady (2011.06.16) (English).PDF  
Letter from Joseph Kohn to Donziger et al (2010.08.09).pdf  
Letter to Alan Lenczner dated and executed 9.20.2016 by Michael Ben-Jacob as  
Trustee of the Evan Family Trust.pdf  
Letter to Gerald Maples (2011.10.20).pdf  
Letter to Motley Rice (2011.10.19) (English and Spanish).pdf

Letter to Treca Financial Solutions (2011.03.15).pdf  
Letter to Treca (2011.10.20) (draft).docx  
Letter to Treca Financial Solutions (2011.02.15).pdf  
list of cases handled by GM.pdf  
list of payments 5.8.12.xlsx  
London Meeting.xlsx  
Mantid International (Iraq)  
March 2012 - Payment Request  
Master Agreement (2010-12-6).docx  
MASTER AP  
MASTER AP (Old)  
MASTER AP 4.1.16.xlsx  
Master Contact List 4.25.12.xlsx  
MedialistBrazil.xlsx  
Medialistcanada.xlsx  
MediaListChevronEmail.xls  
Memo 3.38.12 Steering & Budgets  
Memo Finc 9.20.16.docx  
Memo R  
Memo to Pablo Fajardo re questions on damages recoveries + responses  
(2012.01.04).docx  
Memorandum and Articles of Association - Indigenous People Limited.pdf  
Motley Rice and F.Gerald Maples appearances.docx  
Motley\_Rice\_Apearances\_spreadsheet.XLS  
NDA.LAPs.2016  
New Eauity Available.xlsx  
next steps.msg

NEXTANT

Nextant Invoice 100-1501.pdf

Nextant Invoice 100-1504.pdf

Nov bill.msg

Nov AP Bal

OLD AP Non Active.pdf

Org Chart.docx

Org Chart.pptx

Panam Itinerary 6.27.12.docx

Patton Boggs Retainer Agreement (2011.12.20).doc

payment 5.10.12.xlsx

Payment Request 1 18 12.docx

Payment Request 1 18 12.pdf

Payment Request 3 11 12.docx

Payment Request 3 16 12.docx

Payment Request 3 27 12

Payment Request 3 30 12

Payment Request 5.29.12.xlsx

Payment Request 6.26.12.xlsx

Payment Request 6.28.12.xlsx

Payment Request 7.13.12.xlsx

Payment Request 7.20.12 sd

Payment Request 7.20.12.xlsx

Payment Request 10.1.12 sd

Payment Request 10.10.12 sd

Payment Request 10.15.12 .xlsx

Payment Request 11.14.12.xlsx

Payment Request 12 22 11.docx  
Payment Status.msg  
Payments - Andrew Edit  
Payments - Torvia  
payments 1.15.12.xlsx  
Payments 11.9.12.xlsx  
Placement Agreement - AKTI (2012-02-27).docx  
Placement Agreement - AKTI (2012-02-27)(v2) marked up.docx  
PR Comments 5.7.12.docx  
PR Comments 5.30.12.docx  
Preference Waterfall103111-current.xlsx  
Preference Waterfalln6.30.15.xlsx  
PRN LOA Hinton Communications 5\_2012 (signed).pdf  
Promisory Note Donzinger to Roger Water.pdf  
Proposal for payments 9.14.12.docx  
Q&A.docx  
QA.pdf  
Re confidential proposal for New Orleans lawyers.msg  
RE critical.msg  
RE Ecuador (1).msg  
RE Ecuador (2).msg  
RE Ecuador (3).msg  
RE Ecuador (4).msg  
RE Ecuador (5).msg  
RE Ecuador (6).msg  
RE Engagement Agreement (Lago Agrio matter).msg  
RE Gerald Maples Agreement.msg



RE Lago Agrio (3).msg

RE Lago Agrio (4).msg

RE Lago Agrio (5).msg

Re Lago Agrio (A-2).msg

RE Lago Agrio (A-3).msg

Re Lago Agrio (A-4).msg

RE Lago Agrio (A-5).msg

RE Lago Agrio (A-6).msg

RE next steps (1).msg

RE next steps (2).msg

Re next steps (3).msg

RE next steps (4).msg

RE next steps (5).msg

Response from Treca (2011.02.21).pdf

Retainer Agreement - Motley Rice (2010-12-16) (English).docx

Retainer Agreement - Motley Rice (fully executed) (English).pdf

Retainer Agreement - SKV (draft) 2011-10-10) (English).docx

Retainer Agreement -- Donziger & Associates (2011.01.12) (English)execution.docx

Retainer Agreement -- Donziger & Associates (executed) (English).pdf

Retainer Agreement -- Gerald Maples (2011.02.04) (English)GM executed.doc

Retainer Agreement -- Gerald Maples (English) (fully executed-not released).pdf

Retainer Agreement -- Pablo Fajardo (2011.01.05)(v2) (English)execution.docx

Retainer Agreement -- Pablo Fajardo (executed)(English).pdf

Retainer Agreement -Sergio Bermudes (2012.05.18)(EN)

Retainer Agreement. Aguinda v. Chevron (00042553).pdf

Rizack Agreement 2046\_001.pdf

SD Calander

SD Exp Jan 2012  
SD Exp Sheet  
SD Exp Sheet August 2012  
SD Exp Sheet Feb 2012  
SD Exp Sheet Febuary 2013  
SD Exp Sheet Jan 2012.xlsx  
SD Exp Sheet January 2013  
SD Exp Sheet July 2012  
SD Exp Sheet June 2012  
SD Exp Sheet June Rizack AX 2012  
SD Exp Sheet May 2012  
SD Exp Sheet November 2012  
SD Exp Sheet October 2012  
SD Exp Sheet September 2012  
SD Invoice Jan - March 2012  
Segundo Addendum.pdf  
Selected News and Multimedia – Chevron Ecuador  
September 22 Wellbeck.docx  
Sherman note.pdf  
Side Letter \_ inglés.pdf  
Sider Letter \_ español.pdf  
signature page letter of direction.pdf  
Signed Documents Nov 24 16\_7359481.pdf  
Signed NDA Israel.pdf  
Singed Agreement 2046\_001.pdf  
SKV Fee Proposal (2011.10.04).xlsx  
Smyser reconcillaton

Steering

Steve's list.docx

Steve's list.LNK

Steven Acct 2007-2010

Steven Acct 2007-2010 .pdf

Steven Acct 2007-2010 FINAL

Steven Acct 2012

Steven Acct 2012 to date.pdf

Steven Acct 2013

Steven Acct Summary and amount due 2012 & 2013

Steven Donziger\_North Social\_Portal-A\_Proposal\_6\_11\_12.pdf

Summary of Disputes and Potential Disputes (2012 01 05) (3).docx

Summary of Disputes and Potential Disputes (2012.01.05).docx

Summary of LatAm deals 9.11.12.docx

Summary of Payments 2007-2012 Pie Charts

Table of fundings (as of 2012.01.08)(2).docx

TARGET INVETORS.xlsx

Tax opinion.pdf

TD Bank Transations

Teaser4.26.12.docx

Term sheet.docx

TO DO 4.25.12.docx

TO DO 5.8.12.docx

TO DO 5.26.12.docx

To DO Checklist

TO DO LIST.docx

Torvia -- side letter re option to provide additional funding (2011.06.08)(English)  
(execution) (signed by claimants).pdf

Torvia final Investment agreement (executed).pdf

Torvia payments as of 7.26.12.xlsx

Torvia Payments Reconciliation\_021612.xlsx

Torvia-SRD Agreement for Chevron-Ecuador (executed).pdf

Travel Packing List

UHY Advisors Wire Instructions.docx

untitled

Valuation Model with discounts

valuation vs investment

Valuations 11.4.12.xlsx

VERSION INGLES.pdf

Wellbeck Partners Funding Agreement.pdf

~~West end 3/25/14~~

~~West end 4/4/14~~

~~West end 4/7/14~~

William Carmondy proposal

wire instructions past Oct23.doc

Wire instructions US trust acct\_7141891.pdf

Wire List

Workbook1

Workbook5

Working Group Contact List

Youd care budget